

1 Hon. Benjamin H. Settle
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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

9 ANTHONY FLAAEN, Plaintiff,
10 vs.
11 MCLANE COMPANY, INC. dba MCLANE/
12 NORTHWEST; MCLANE COMPANY, INC.
13 dba MCLANE/NORTHWEST LONG-TERM
DISABILITY PLAN; and PRINCIPAL LIFE
INSURANCE COMPANY,
14 Defendants.

Case No. 3:15-cv-05899-BHS

**DECLARATION OF NANCY TAYLOR
IN SUPPORT OF DEFENDANT
PRINCIPAL LIFE INSURANCE
COMPANY'S RESPONSE BRIEF IN
OPPOSITION TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

**NOTE ON MOTION CALENDAR:
July 29, 2016**

15 I, Nancy Taylor, being first duly sworn, depose and state as follows:
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17 1. I hold the position of Senior Claim Account Manager with Principal Life Insurance
18 Company ("Principal Life"). In that position I am familiar with the group long term disability
19 coverage issued to McLane Company, Inc. by Principal Life pursuant to the terms of Group Policy
20 No. H25974. I make this affidavit based upon my own personal knowledge and the business
21 records of Principal Life.

22 2. A true and correct copy of the group long term disability policy No. H25974, issued
23 to McLane Company, Inc., is attached hereto as Exhibit A. Group Long Term Disability Policy No.
24 H25974 was issued and delivered in the State of Texas on a policy form approved by the Texas
25 Department of Insurance.

26 3. A true and correct copy of the group long term disability booklet-certificate, issued
27 in connection with Group Policy No. H25974, and provided to the policyholder for distribution to

